

#### Programs and Policies to Assist Low-Income Electric and Natural Gas Utility Customers

# Washington Utilities and Transportation Commission

September 6, 2005

John Howat

jhowat@nclc.org

Headquarter: 77 Summer St, 10th Fl. Boston, MA 02110 Phone: (617) 542-8010 Fax: (617) 542-8028 Email: consumerlaw@nclc.org Website: consumerlaw.org

# Policy Goals

 Achieve long-term energy affordability and security for lowincome households

 Achieve reduced utility system costs associated with low-income customer credit and collections

#### Low-Income Energy Security: Necessary Program Features

- Affordable Payments
- Arrearage Reduction and Management
- Secure Funding
- Efficient, Informed Energy Usage
- Effective Regulatory Consumer Protections
- Tracking and reporting utility arrearages, service terminations/restorations and uncollectible accounts

#### Affordable Payments

- Key to low-income energy security
- Payments based on customer income and target household energy burden level
  - Benefit level calculated to reduce participant household energy burden level to that of median-income household (Nevada)
  - Tiered Discount (New Hampshire)
- Federal, non-federal subsidies and energy efficiency benefits fill the gap between LI and MI burdens

#### Arrearage Reduction

- Low-income customers make regular, affordable monthly payments and reduce arrearages over time
- Implementation in conjunction with payment assistance program
- Example: 3-year payoff where 1/12 of outstanding arrearages are forgiven after three months of timely payments (Pennsylvania)

#### Efficient, Informed Usage

- Payment assistance should coincide with availability and encouragement to participate in effective appliance and building efficiency programs
- Percentage of total DSM set aside for lowincome purposes
- Innovation in cost-effectiveness testing and program measure identification

# Sufficient and Dependable Program Funding

- Sufficiency: Enough \$ to fully fund lowincome assistance programs and achieve policy goals
- Dependability: Long-term secure, reliable sources
- Both federal and non-federal sources
- Utility contributions based on revenues (not sales) (Montana)

#### Regulatory Consumer Protections

- Regulatory structure should contain provisions based on recognition of the extent to which nonpayment occurs as a result of inability to pay
- Clear link between regulatory termination protections and a affordable payment program outlined above

## Regulatory Consumer Protections: Utility Payment Plans

- Offered to low-income customers as alternative to service termination or as terms of service restoration
- Initial payment plan of sufficient duration to account for customer's household financial circumstances
- 12-month minimum
- If initial payment plan fails and customer has demonstrated a good-faith effort to pay, a subsequent payment plan of equal or greater duration should be offered (Iowa)

#### Data Tracking

- Necessary to inform effective program design and implementation
- General residential and low income arrearages, service terminations and reconnections, and write-off of uncollectible accounts
- Monthly reporting by jurisdictional utilities (Iowa, Pennsylvania, Ohio)

## YTD Electric and Natural Gas Utility Service Terminations and Reconnections: Pennsylvania, June 2004 and June 2005

